

Southern Communications Services, Inc.  
d/b/a/ Southern Linc  
5555 Glenridge Connector, Suite 500  
Atlanta, Georgia 30342

November 26, 2018

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: In the matter of reliability and continuity of Communications Networks,  
Including Broadband technologies effects on Broadband Communications  
Networks of Damage or Failure of Network equipment or severe overload, PS  
Docket 11-60**

Dear Ms. Dortch:

Southern Communications Services, Inc. d/b/a Southern Linc (“Southern Linc” or the “Company”) hereby submits the redacted, public version of its response (“WRCF Response”) to the Federal Communications Commission’s (“FCC” or the “Commission”) letter dated November 6, 2018 (“WRCF Letter”) regarding the Company’s disaster response during the 2017 and 2018 hurricane seasons and the Company’s commitment to the Wireless Resiliency Cooperative Framework (the “Framework”).

This redacted, public version of Southern Linc’s WRCF Response is being filed electronically in the Commission’s Electronic Comment Filing System (“ECFS”) contemporaneously with Southern Linc’s filing of an unredacted version for which it has requested confidential treatment pursuant to Section 0.459 of the Commission’s rules.<sup>1</sup>

---

<sup>1</sup> See 47 C.F.R. § 0.459.

Ms. Marlene H. Dortch  
Federal Communications Commission  
November 26, 2018  
Page 2

Please contact the undersigned with any questions in connection with this filing.

Respectfully submitted,

/s/ Michael D. Rosenthal

Michael D. Rosenthal  
Director of Legal & External Affairs  
Southern Linc

cc: Jeffrey Goldthorp ([Jeffrey.Goldthorp@fcc.gov](mailto:Jeffrey.Goldthorp@fcc.gov))  
Renee Roland ([Renee.Roland@fcc.gov](mailto:Renee.Roland@fcc.gov))

Attachment

**REDACTED**

**Southern Linc  
Wireless Resiliency Cooperative Framework Response**

**I. Introduction**

Southern Communications Services, Inc. d/b/a Southern Linc ("Southern Linc" or the "Company") is a wholly owned subsidiary of Southern Company and operates a commercial digital 800 MHz ESMR system to provide interconnected voice, dispatch, push-to-talk, text and picture messaging, internet access, and data transmission services. Southern Linc provides these services over a 127,000 square mile service territory covering Alabama, Georgia, southeastern Mississippi, and the Florida panhandle. Southern Linc offers comprehensive geographic coverage, serving the extensive rural territory within its footprint as well as major metropolitan areas and highway corridors. Because of its expansive regional coverage and history of reliability, Southern Linc's service is widely used by state and local public safety agencies, school districts, rural local governments, public utilities, and other emergency responders. It is also utilized by other commercial entities in both urban and rural areas. Southern Linc is in the process of transitioning its network from the iDEN air interface to an all-LTE platform.

As a subsidiary of Southern Company, Southern Linc also supports the internal communications needs of its affiliated electric utility operating companies. These include not only mobile services but also fixed point-to-point and fixed point-to-multipoint wireless services for a variety of applications that support the safe, reliable, and efficient delivery of essential electric utility services, such as monitoring, load management, protective relaying, and supervisory control and data acquisition ("SCADA") systems.

Southern Linc supports the Wireless Resiliency Cooperative Framework (the "Framework") and is committed to continuing efforts to ensure its wireless network is resilient and quickly restored after disasters. Areas within Southern Linc's service territory regularly experience severe weather such as severe thunderstorms, tornados, tropical storms, and hurricanes such as those experienced in 2017 and 2018. Since its inception over 20 years ago, Southern Linc has worked closely with state and local government agencies to provide mission critical communications services to its public safety partners.

Southern Linc's Incident Support Team ("IST"), comprised of subject matter experts from all departments of the Company, convenes as severe weather approaches or other disasters occur. The Company has implemented processes and procedures for before and during severe weather incidents; these processes and procedures are reviewed and adjusted, as appropriate, after each severe weather incident. [REDACTED]

[REDACTED] Southern Linc's IST also includes representatives who coordinate with Southern Company's electric utility operating companies to ensure cohesive communications and response to disasters. Southern Linc personnel are also on site at state emergency management agency ("EMA") operations centers, when

**REDACTED**

applicable, to coordinate response and recovery efforts for Southern Linc's government public safety customers. Lastly, Southern Linc coordinates with third-party contractors, such as tower crews, should they be needed for restoration efforts.

After a severe weather incident occurs, Southern Linc responds quickly, and safely, to repair any damaged equipment in its territory. Additionally, the Company has a fleet of mobile assets which can be deployed to augment service in any impacted area so that capacity and coverage is available for those responding to the incident.

**II. Identify each event by date, location, and type of disaster and include specific information related to the way Southern Linc fulfilled the reasonable roaming and mutual aid prongs of the Framework**

The following is a list of events during the 2017 and 2018 hurricane seasons that impacted areas within Southern Linc's territory and where FCC's Disaster Information Reporting System ("DIRS") and Emergency Support Function 2 ("ESF-2") were activated:

- Hurricane Irma
  - Date: September 6, 2017 – September 18, 2017
  - Location in Southern Linc territory impacted: Alabama and Georgia
- Hurricane Nate
  - Date: October 8, 2017 – October 9, 2017
  - Location in Southern Linc territory impacted: Alabama and Mississippi
- Hurricane Florence
  - Date: September 12, 2018 – September 24, 2018
  - Location in Southern Linc territory impacted: Georgia
- Hurricane Michael
  - Date: October 9, 2018 – October 26, 2018
  - Location in Southern Linc territory impacted: Alabama, Florida, and Georgia

During all of these events, Southern Linc's network proved to be resilient as designed and the network was restored as soon as possible to ensure Southern Linc's public safety and utility customers were able to communicate.

Southern Linc currently operates its legacy iDEN network and, since September 2018, its new LTE network. As mentioned, Southern Linc is currently transitioning from iDEN to LTE. To our knowledge, there are no other carriers in the United States that employ the iDEN technology or that could roam onto our iDEN network. [REDACTED]

REDACTED

[REDACTED]

Additionally, in the aftermath of Hurricane Maria, Southern Linc participated in efforts to restore power to remote regions in Puerto Rico. The Company's telecommunications services enabled power restoration teams to communicate with each other and coordinate work in the Mayaguez and Barranquitas regions of Puerto Rico, as well as coordinate with headquarters and communicate with family back home.<sup>2</sup>

- III. Include a detailed list of both mutual aid and roaming arrangements that Southern Linc had in place for each of the events, the names of the parties to the agreements, whether Southern Linc modified these agreements depending on the scope, location, and/or duration of the disaster, how Southern Linc operationalized each of these agreements, and what, if any, impediments Southern Linc faced in implementing or honoring these agreements**

- IV. Describe any instances in which either Southern Linc or another carrier declined a request for mutual aid or roaming and the surrounding circumstances**

Southern Linc has not declined any requests for mutual aid or roaming during disasters. Southern Linc has not been denied specific requests for mutual aid; [REDACTED]

---

<sup>2</sup> See Letter from Southern Linc Re Special Temporary Authority for Southern Linc in Puerto Rico (dated May 31, 2018), [https://ecfsapi.fcc.gov/file/105312704723713/Thank%20You%20Letter%20to%20FCC%20\(2018053118\).pdf](https://ecfsapi.fcc.gov/file/105312704723713/Thank%20You%20Letter%20to%20FCC%20(2018053118).pdf).

REDACTED

**V. Describe the extent to which Southern Linc implemented the CTIA Best Practices for Enhancing Emergency and Disaster Preparedness and Restoration during each event**

Preparedness Prior to Disasters:

To the extent possible, Southern Linc ensures lines of communication with state and local governments are open and working prior to known storms. Southern Linc assigns storm-team personnel to each EMA operations center to ensure that state and local agencies have sufficient equipment and coverage at their operations centers and staging areas. Southern Linc coordinates staging of assets with state EMAs and utilities. At the same time, [REDACTED]

Southern Linc secures required credentials needed for employees and contractors to access disaster areas for storm restoration efforts. Credentialing is managed at the state level with each state's EMA on either an annual or incident-specific basis (varies by state). [REDACTED]

Southern Linc also participates in annual storm drills or other exercises that state and local government agencies perform throughout the year. In most cases, Southern Linc personnel play an active role in the drills and exercises as well as the follow up discussions. [REDACTED]

Response During and After Disasters:

[REDACTED]

[REDACTED]

**REDACTED**

Creating Awareness and Education Efforts:

Southern Linc publishes disaster preparedness information on its social media accounts in advance of major storms that may impact areas within the Southern Linc service territory. For example, prior to both Hurricane Irma and Hurricane Michael, Southern Linc published CTIA's Emergency Preparedness Checklist on its Facebook page. Additionally, during the year, Southern Linc participates in table top exercises with its state and local government partners.

**VI. Identify any situations in which Southern Linc did not implement the Framework (when both ESF-2 and DIRS were activated) and explain why**

There were no situations in Southern Linc's footprint in which Southern Linc did not implement the Framework where feasible when both ESF-2 and DIRS were activated.

**VII. Conclusion**

Southern Linc will continue to work diligently with other carriers, state and local government agencies, public safety, and trade associations to improve resiliency and disaster response. Southern Linc remains committed to the Framework, improving resiliency, disaster preparedness, and disaster response in order to better serve our customers and the public during emergency situations and natural disasters.